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Filing date: **09/17/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91206079
Party	Plaintiff Athletics Investment Group LLC d/b/a The Oakland Athletics Baseball Company
Correspondence Address	SCOTT P CERESIA COWAN LIEBOWITZ A& LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES spc@cll.com, jmn@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Scott P. Ceresia
Filer's e-mail	spc@cll.com, jmn@cll.com, trademark@cll.com
Signature	/Scott P. Ceresia/
Date	09/17/2012
Attachments	MATHLETICS - Motion to Suspend (Sept. 17, 2012).pdf (3 pages)(11417 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application Serial No. 85/411,190
Filed: August 30, 2011
For Marks: MATHLETICS and Design
Published in the Official Gazette: January 17, 2012

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ATHLETICS INVESTMENT GROUP LLC D/B/A	:
THE OAKLAND ATHLETICS BASEBALL	:
COMPANY,	:
	:
Opposer,	:
	:
v.	:
	:
3P LEARNING PTY LIMITED,	:
Applicant.	:
-----X	

Opposition No. 91206079

**MOTION ON CONSENT TO CONTINUE SUSPENSION OF PROCEEDINGS
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order continuing the suspension of the proceedings in this matter for a period of two (2) months, until **November 17, 2012**. Applicant consented to this motion, which is requested to allow the parties to engage in settlement discussions.

As noted in Opposer's September 4, 2012 motion for suspension in related Opposition No. 91197518, since the last suspension, Opposer's outside counsel discussed Applicant's revised settlement terms with Opposer's in-house counsel. Subsequently, Opposer's outside counsel conducted a settlement call with Applicant's counsel to discuss Opposer's response to the latest settlement offer. The additional time is requested to allow Opposer and Applicant the opportunity to conduct additional settlement talks in an attempt to further narrow the remaining

issues to be negotiated, and for the parties to continue negotiating a potential settlement of this matter.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicant to file an answer or otherwise respond to the Notice of Opposition until sixty (60) days after such denial.

If the Board grants this motion, the Board should also reset Applicant's time to answer or otherwise respond to the Notice of Opposition. Additionally, the parties request that six months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the proceedings resume so that the parties will have the full period of discovery in the event that the matter is not able to be resolved. The trial periods and other periods should be reset accordingly.

Dated: New York, New York
September 17, 2012

COWAN LIEBOWITZ & LATMAN, P.C.
Attorneys for Opposer

By: /Scott P. Ceresia/

Mary L. Kevlin
Richard S. Mandel
Scott P. Ceresia
1133 Avenue of the Americas
New York, New York 10036
(212)790-9200

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on September 17, 2012, I caused a true and correct copy of the foregoing Motion on Consent to Suspend to be sent via First Class Mail, postage prepaid, to Applicant's attorney of record and correspondent, Barry F. Soalt, Esq., Procopio Cory Hargreaves & Savitch LLP, 525 B Street, Suite 2200, San Diego, CA 92101.

/ Scott P. Ceresia/
Scott P. Ceresia